

## REMARKS

Claims 1-25 were pending prior to entering this amendment. Claims 1-25 stand rejected under 35 U.S.C. § 102(e). Claims 18-25 have been canceled. Claims 1, 8 and 9 have been amended and new claims 26-38 have been added. At least in light of the above amendments and the foregoing remarks, reconsideration and allowance of the claims is respectfully requested.

### *Claim Rejections Under 35 U.S.C. § 102*

Claims 1-25 are rejected under 35 U.S.C. 102(e) as being anticipated by Dykeman (U.S. Patent 7,177,951 B1). Claims 1-17 and 26-38 are currently pending. Applicant submits that claims 1-17 and 26-38 are allowable over Dykeman. Therefore, Applicant respectfully traverses the claim rejections for the reasons explained herein.

With respect to claim 1, Applicant claims a crankback method wherein upon detecting a call failure *inside* a second peer group, a succeeding end crankback specifies a blocked interface on a first link between the first and second peer groups wherein the first link is *outside* the first and second peer groups, the succeeding end crankback causing the first peer group to send a second connection request using a second link to the second peer group that avoids the call failure.

This method avoids the inefficiency of conventional Private Network-to-Network Interface (PNNI) routing wherein if a call failure occurs inside a second peer group, the border node of the second peer group will generate a crankback specifying that the failure occurred at 'the next higher level', this crankback type indicates that the entire peer group is blocked thus causing re-routed calls to avoid the second peer group entirely. If there is still a viable path through the second peer group, it is inefficient to re-route around the second peer group.

Also, in conventional PNNI routing, if the call failure occurs on a link connecting the first peer group and the second peer group, a different type of crankback is generated which indicates a blocked link on a 'succeeding end'. In this case, the 'succeeding end' crankback causes the first peer group to try an alternate route through the second peer group, if one exists. See the present specification page 2, lines 24-30 and page 3, lines 1-21.

In the current disclosure, Applicant discloses a method of causing a first peer group to try an alternate path through the second peer group by leveraging the difference between the two

crankback types described above. If a failure inside a second peer group occurs, a ‘succeeding end’ crankback is generated rather than a ‘next higher level’ crankback in order to cause the first peer group to try an alternate route through the second peer group.

In contrast, Dykeman discloses a method of address management wherein a peer group leader can actively check address connectivity within a peer group and update its topology database rather than waiting for address information to be flooded. *See* Dykeman col. 3, lines 15-43. The device of Dykeman avoids unnecessary crankback because the address information is kept current between standard address updating procedures. However, in contrast to claim 1, in Dykeman, crankback is generated in a conventional way. *See* Dykeman col. 10, lines 60-67 and col. 11, lines 1-12. Dykeman at least does not teach or disclose a method of indicating a ‘succeeding end’ crankback rather than a ‘next higher level’ crankback in order to cause the first peer group to seek an alternate route through the second peer group as is disclosed in claim 1. Therefore, Claim 1 distinguishes from Dykeman on at least the foregoing basis and should be allowed. Claims 2-8 depend from claim 1 and should also be allowed.

Claim 9 distinguishes from Dykeman on at least the same or similar basis as claim 1 and should be allowed. Claims 10-17 depend from claim 9 and should also be allowed.

#### *New claims*

New claims 26-38 are respectfully submitted and should be allowed for at least the following reasons; claim 26 distinguishes from Dykeman on at least the same or similar basis as claim 1 and should be allowed and claims 27-35 depend from claim 26 and should also be allowed and claim 36 distinguishes from Dykeman on at least the same or similar basis as claim 1 and should be allowed and claims 37-38 depend from claim 36 and should also be allowed.

Additionally, support for new claims 26-38 can be found throughout the specification, for instance; support for claims 26, 29, 30, 32 can at least be found on page 4, lines 11-29, support for claim 27 can at least be found on page 4, lines 15-19, support for claim 28 can at least be found on page 12, lines 11-21, support for claim 31 can at least be found on page 9, lines 8-13, support for claim 33 can at least be found on page 11, lines 1-12, support for claim 34 can at least be found on page 11, lines 1-12, support for claim 35 can at least be found on page 11, lines 14-20, support for claim 36 can at least be found on page 4, lines 11-24, support for claim 37 can

at least be found on page 11, lines 1-12 and support for claim 38 can at least be found on page 11, lines 14-20.

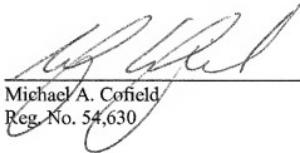
***Conclusion***

For the foregoing reasons, reconsideration and allowance of all pending claims is requested. The examiner is encouraged to telephone the undersigned at (503) 224-2170 if it appears that an interview would be helpful in advancing the case.

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Respectfully submitted,

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